

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA**

WILD VIRGINIA, et al.,

*Plaintiffs,*

v.

COUNCIL ON ENVIRONMENTAL  
QUALITY, et al.,

*Defendants.*

Civ. No. 3:20-cv-45-MFU

Hon. Michael F. Urbanski

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**BUSINESS ASSOCIATIONS' MOTION TO DISMISS**

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Pursuant to Federal Rule of Civil Procedure 12(b)(1), proposed Intervenor-Defendants American Farm Bureau Federation, American Fuel & Petrochemical Manufacturers, American Forest Resource Council, American Petroleum Institute, American Road & Transportation Builders Association, Chamber of Commerce of the United States of America, Federal Forest Resource Coalition, Interstate Natural Gas Association of America, and National Cattlemen's Beef Association (the "Business Associations") hereby move to dismiss plaintiffs' complaint for lack of an Article III case or controversy. In support of this motion, the Business Associations rely upon the accompanying Brief in Support of Business Associations' Motion to Dismiss; any reply brief submitted in support of the motion; and any oral argument permitted at a hearing on the motion.

Dated: August 25, 2020

Respectfully submitted,

/s/ Joshua D. Rogaczewski

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*\* pro hac vice motion pending*